

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

SANDRA FOY JOHNSON, individually,)	
and on behalf of the ESTATE OF)	
DONALD JOHNSON, deceased,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.: 4:16-CV-256-WTM-GR
)	
CORIZON HEALTH, INC., a Tennessee)	
Corporation; CORIZON LLC, a Missouri)	
limited liability company; JOHN WILCHER)	
in his capacity as CHATHAM COUNTY)	
SHERIFF; CLAYTON M. RAMSU, M.D.;)	
and JOSEPH G. MOYSE, M.D.,)	
)	
Defendants.)	

PLAINTIFFS' MOTION TO EXTEND TIME FOR DISCOVERY

NOW COME Plaintiffs, through counsel, and pursuant to Federal Rule of Civil Procedure 26.2, hereby requests that the Court grant an extension of time for the parties to pursue discovery by showing the Court the following:

1. Defendant was initially represented by attorney Will Claiborne who filed Plaintiffs' Complaint with this Court.
2. On June 1, 2017, attorney Claiborne filed a motion to withdraw as attorney for Plaintiffs.
3. On June 5, 2017, this Court granted attorney Claiborne's motion to withdraw.
4. Plaintiffs were without representation from the time this Court granted

attorney Claiborne's motion to withdraw until July 6, 2017, when Plaintiff's present attorneys entered a Notice of Appearance.

5. Plaintiffs' attorneys have no discovery documents in their possession at the present time, but have sought same from attorney Claiborne.

6. Plaintiffs' attorneys entered the present case after an important date passed, to wit, the last day to furnish expert witness report by Plaintiffs which was June 28, 2017. As a result, Plaintiffs are unaware at the present time if any expert witnesses were listed or given to the defense. Accordingly, Plaintiffs seek to extend the furnishing of expert witnesses until the date of September 28, 2017.


7. Further, Plaintiffs propose the following extension: Defendant's expert witness report be due on November 28, 2017; that a joint status report be due on December 28, 2017; that a close of fact discovery be due October 28, 2017; that a close of expert discovery be due January 26, 2018; and finally that a last date for filing Daubert motions and motions in limine be filed by February 26, 2018.

Plaintiffs make such a request for an extension of discovery based on Plaintiffs' new counsels' needs in diligently pursuing Plaintiffs' claims having just recently entered this case. At the present time, Plaintiffs have no access to important documents or discovery facts needed to adequately represent Plaintiffs.

Accordingly, Plaintiffs respectfully request that the Court grant their Motion to Extend Discovery as outlined above.

Respectfully submitted this 19th day of July, 2017.

HAROLD J. CRONK, P.C.
Professional Corporation


BY: 
HAROLD J. CRONK
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STATE BAR NO. 197397

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served all counsel of record in the foregoing matter with a copy of this document

_____ by hand delivery; or

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This 19th day of July, 2017.

HAROLD J. CRONK, P.C.
Professional Corporation

BY: _____


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